

### R E M A R K S

Careful review and examination of the subject application are noted and appreciated.

### SUPPORT FOR THE CLAIM AMENDMENTS

Support for the claim amendments may be found in the specification, for example, on page 11 lines 3-17, page 16 line 17- page 17 line 20, page 18 lines 4-11, page 14 line 16-page 15 line 14 and FIGS. 2, 4 and 5, as originally filed. Thus, no new matter has been added.

### CLAIM REJECTIONS UNDER 35 U.S.C. §102

The rejection of claims 1-11 and 20 under 35 U.S.C. §102(b) as being anticipated by Iwata '771 has been obviated by amendment and should be withdrawn.

Iwata concerns a motion vector processing circuit (Title).

Claim 1 provides a third circuit configured to generate (i) a mode signal identifying a best mode among at least four partition modes, (ii) a motion signal conveying at least one motion vector associated with the best mode and (iii) a score signal conveying a score value associated with the best mode all in response to the sum values. In contrast, Iwata appears to be silent regarding identification of a best mode among at least four

modes and a score value associated with the best mode. Therefore, Iwata does not appear to disclose or suggest a third circuit configured to generate (i) a mode signal identifying a best mode among at least four partition modes, (ii) a motion signal conveying at least one motion vector associated with the best mode and (iii) a score signal conveying a score value associated with the best mode all in response to the sum values as presently claimed. Claims 11 and 20 provide language similar to claim 1. As such, the claimed invention is fully patentable over the cited reference and the rejection should be withdrawn.

Claim 6 provides an adder circuit, a storage circuit and a select circuit. Despite the assertion in the Office Action, the text in column 4, lines 25-60 of Iwata appears to be silent regarding the three claimed circuits. Therefore, *prima facie* obviousness has not been established for lack of evidence that the references explicitly or inherently disclose all of the claimed elements. As such, the Office is respectfully requested to either (i) clearly identify the elements of Iwata allegedly similar to the three claimed circuits or (ii) withdrawn the rejection.

Claims 2-4, 6, 7 and 10 depend from claim 1, which is now believed to be allowable. As such, the dependent claims are fully patentable over the cited reference and the rejections should be withdrawn.

New claims 21-25 depend from claims 1 and 11, which are now believed to be allowable. As such, the dependent claims are fully patentable over the cited reference and should be allowed.

**CLAIM REJECTIONS UNDER 35 U.S.C. §103**

The rejection of claims 12-19 under 35 U.S.C. §103(a) as being unpatentable over Iwata is respectfully traversed and should be withdrawn.

Claim 12 provides a step of generating a plurality of first intermediate values from the sum values, one of the intermediate values corresponding to each of the partition modes of the current block. In contrast, the figures 11-14 and the text in column 12-15 of Iwata appear to be silent regarding the claimed first intermediate values. Therefore, *prima facie* obviousness has not been established for lack of evidence that the reference teaches or suggest all of the claim limitations. Similar omnibus rejections exist for claims 13-17. As such, the Office is respectfully requested to either (i) explain the pertinence of the reference as required by 37 C.F.R. §1.104(c)(2) or (ii) withdraw the rejections.

Claims 12-17 depend from claim 11, which is now believed to be allowable. As such, the dependent claims are fully patentable over the cited references and the rejections should be withdrawn.

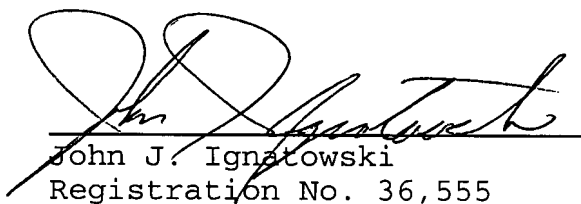
Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative between the hours of 9 a.m. and 5 p.m. ET at 586-498-0670 should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge Deposit Account No. 12-2252.

Respectfully submitted,

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